

# EXHIBIT 112

**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Karen Lewis. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Gwinnett County in Georgia and my residence address is [REDACTED] Snellville, Georgia.
3. I have experienced problems voting in Georgia two different times. First, in 2014 in DeKalb County and then in 2018 at Annistown Elementary School in Gwinnett.
4. In 2014, I was living in DeKalb County with my sister in the apartments on Turner Hill near Stonecrest Mall.
5. My sister and I both work in downtown Atlanta. Normally, I would get off work at 6:00pm and my commute home on I-20 East is about an hour and a half. On the day of the primary elections in 2014, I was allowed to leave work early to vote. My sister and I left downtown together at 4:30. We drove directly from downtown to our voting location which was New Birth Missionary Baptist Church where we arrived around 6:10pm.
6. We had not voted at New Birth before. It is a very large church and we didn't know where in the church facilities the polling place was located.
7. We did not see any signs telling us where to go to vote, so we parked the car and walked around looking for the entrance.

8. We must have walked a mile, but we couldn't figure out where to go. We would go into different doors and ask whoever we found where the voting was taking place, but no one knew.

9. My sister was 62 years old at the time and not in the best of health. The walking was taking a toll on us.

10. We walked and we walked. I pulled up my voter information on my phone to make sure we were in the right location. The voter information confirmed New Birth Church, but we couldn't find any signs telling us that voting was happening there.

11. Finally, we opened one door and there were signs *inside* the building that pointed to the voting. We arrived at the table to check in for voting at 6:55pm. If it had taken us any longer to find the right door, we would have missed the chance to vote.

12. I vote in every single election because I believe it is our right, and we can't complain if we don't cast our votes. I was so frustrated that I almost missed voting because there were no signs outside the polling place telling voters what part of the big church had the voting. After that experience, I made sure to vote early for the general election.

13. After 2014, I moved to Gwinnett County where I vote at Annistown Elementary School. I have voted there many times without an issue.

14. On election day in November 2018, my daughter and I arrived at Annistown Elementary at 6:55am. There was a line with about 30 people ahead of us waiting to vote.

15. At 7:00am when the voting was supposed to begin, someone came out and announced that there would be no voting at that time because a machine was broken. They said they had already sent out for another one, but that they didn't know how long it would take to get it. They said we were welcome to stay in line and wait or come back later.

16. At 8:00 my daughter and I were still in line. At this point, the line wrapped around the building. They again announced that they were waiting on a machine and no one could vote.

17. Around 8:45, I heard loud clapping and people in the line said the new machine had arrived.

18. They set up the second machine, but then there was an announcement that the new machine wasn't working either.

19. There was a lot of grumbling from the people in line and someone asked about provisional ballots. The poll worker said that they couldn't do that, but that people could come back and vote later.

**20.** Some of the people in line started leaving. They had to walk past the table with the poll workers on their way out. As they did, some of them got provisional ballots.

**21.** At around 9:00 or 9:30, the poll workers started giving out chairs to the people in line since we had been standing there for several hours. At this point, there were at least 200 people in line. Somewhere around this time, an organization that I didn't know the name of started giving out snacks and drinks.

**22.** I saw about 30-40 people leave. The poll workers encouraged them to come back later. Some of them got provisional ballots.

**23.** After about four hours in line, I was able to cast my ballot at 11:15. My daughter also stayed in the line and voted.

**24.** I had voted at Annistown Elementary in the past, and I never had to wait in line.

**25.** I was scheduled to be at work on election day. My work start time that day was 7:15am, but I am a federal employee, and we are given a three-hour window to vote. I should have been at work at 10:15, but even if I had to take personal time, I would have stayed in line because I was determined to vote that day. Luckily, my supervisor is very flexible, and I didn't have to take personal time in order to exercise my right to vote.

26. Voting is very important to me because, as a federal worker, there are limits on how much campaigning I can do. I passed my passion for voting on to my daughters.

27. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

28. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

29. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 4<sup>th</sup> day of October, 2019.

  
Signature  
Karen Lewis